LAW OFFICES OF BING LI, LLC Bing Li, Esq. (BL 5550) 1350 Broadway, Suite 1001 New York, NY 10018-0947 (212) 967-7690 (212) 658-9788 (facsimile) bli@blillc.com

Daniel P. Levitt, Esq. (DL 6020) Co-Counsel 145 Griffen Avenue Scarsdale, NY 10583 (914) 698-8193 Attorneys for Defendants Hongming Li and Xiaoming Zhang

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BANK OF COMMUNICATIONS, NEW YORK BRANCH,

07 civ. 4628 (TPG)

Plaintiffs,

-against-

OCEAN DEVELOPMENT AMERICA, INC., HONGMING LI a/k/a MICHAEL LI and XIAOMING ZHANG,

Defendants -----x

## DECLARATION OF HONGMING LI IN SUPPORT OF MOTION FOR RELIEF FROM JUDGMENT

HONGMING LI, declares under penalty of perjury as follows:

 I am a resident and citizen of the State of California and am an individual defendant named in the above-captioned action. The other individual defendant, Xiaoming Zhang, is my wife.

- 2. I had worked for Ocean Development America, Inc. ("Ocean"), the corporate defendant herein, from 1996 to 2004, responsible for its warehouse related duties and functions.
- 3. I respectfully submit this Declaration in support of my and my wife's motion for relief from a judgment entered on default in this action on March 10, 2008 to the extent as against me and my wife for the debt owed by Ocean to plaintiff Bank of Communications, New York Branch ("BOCNY"), and for such other relief as the Court may deem just and proper.
- 4. I have read the Declaration of Xiaomin Zhang (my wife) made contemporaneous herewith and hereby declare that the statements made therein by my wife are true and accurate.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on July 2008 Los Angeles, California